

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In the Matter of: Carl and Carolyn Morris,
Debtor

Chapter 13
Case No. 15-30483-svk

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Carl and Carolyn Morris, by and through her attorneys, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

U. S. Courthouse - Clerk of Bankruptcy Court
517 E. Wisconsin Avenue
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must also mail a copy to:

Chad L. Schomburg
Debt Advisors, SC
2600 N. Mayfair Rd., Suite #700
Milwaukee, WI 53226

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

Debt Advisors, SC
2600 N. Mayfair Road, Suite 700
Milwaukee, WI 53226
T: 414-755-2400
F: 414-257-0172

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is:

☒ the Debtors;

☐ the Chapter 13 Trustee (post-confirmation modifications only);

☐ the holder of an unsecured claim (Name: _____) (post-confirmation modifications only).

2. This is a request to modify a Chapter 13 Plan (Select A. or B.):

A. ☐ post-confirmation;

B. ☒ pre-confirmation (Select i. or ii.):

i. ☒ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or

ii. ☐ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:

3. The Proponent wishes to modify the Chapter 13 Plan to do the following:

- **Amend the plan to provide for a step up in plan payments upon payment in full of the Debtors' Thrift Savings Plan loan, to account for any proceeds from the Lipitor class-action lawsuit, to account for the claim filed by United Consumer Financial Services, claim #11, and to reduce the amount paid to general unsecured creditors**

4. The reason(s) for the modification is/are: **to provide for a step up in plan payments upon payment in full of the Debtors' Thrift Savings Plan loan, to account for any proceeds from the Lipitor class-action lawsuit, to account for the claim filed by United Consumer**

Financial Services, claim #11, and to reduce the amount paid to general unsecured creditors.

5. Select A. or B.

A. ☐ The Chapter 13 Plan confirmed or last modified on is modified as follows:

B. ☒ The unconfirmed Chapter 13 Plan dated September 24, 2015 - is modified as follows:

The estimated payoff date for the Debtors' Thrift Savings Plan loan is November 2016. Therefore, Debtors' monthly plan payment shall increase to \$1770.00 per month, paid in bi-weekly installments of \$816.93, beginning in December 2016. Also, the Debtors will pay to the Trustee any non-exempt portion of any settlement they receive from the pending Lipitor lawsuit. The Trustee shall pay the secured claim of United Consumer Financial Services, claim #11, in full through the Plan. Finally, after all other classes have been paid, Trustee will to creditors with allowed general unsecured claims a pro rata share of not less than \$21,180.00 or 51%, whichever is greater.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated this 26th day of January, 2016.

DEBT ADVISORS, S.C.
/s/ Chad L. Schomburg
Chad L. Schomburg, # 1036431

Debt Advisors, SC
2600 N. Mayfair Road, Suite 700
Milwaukee, WI 53226
T: 414-755-2400
F: 414-257-0172

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In the Matter of: Carl and Carolyn Morris,
 Debtor

Chapter 13
Case No. 15-30483-svk

CERTIFICATE OF MAILING

The undersigned, an Attorney, does hereby certify that a copy of the Motion to Modify Chapter 13 Plan filed this day, was electronically served or mailed on January 26, 2016 to:

1. United States Trustee's Office, via ECF.
2. Mary B. Grossman, Chapter 13 Trustee, via ECF.
3. List of Creditors (attached).
4. Debtor.

Dated this 26th day of January, 2016.

DEBT ADVISORS, S.C.

/s/ Chad L. Schomburg

Chad L. Schomburg, # 1036431

Debt Advisors, SC
2600 N. Mayfair Road, Suite 700
Milwaukee, WI 53226
T: 414-755-2400
F: 414-257-0172

Label Matrix for local noticing
1757-2
Case 15-30483-svk
Eastern District of Wisconsin
Milwaukee
Mon Jan 25 15:58:53 CST 2016
T&T
Risk Management Office
135 S. 95th St.
Milwaukee, WI 53214-1226

OWEN LOAN SERVICING, LLC
Robertson, Anschutz & Schneid, P.L.
6409 Congress Ave
Suite 100
Boca Raton, FL 33487-2853

United Consumer Financial Serv.
Bass & Associates, P.C.
3936 E. Ft. Lowell Rd, Suite 200
Tucson, AZ 85712-1083

Academic Loan Group/gl
Po Box 7860
Madison, WI 53707-7860

Acaln/glelsi
P.o. Box 7860
Madison, WI 53707-7860

Wachovia Education
Attn: Wachovia Education Finance
Po Box 7057
Utica, NY 13504-7057

Alliance Collection Agencies
P.O Box 1267
Marshfield, WI 54449-7267

Anc Mortgage Services
10801 6th Street
Rancho Cucamon, CA 91730-5977

American Home Mtg Srv/Homeward Residenta
Attn: Bankruptcy
Po Box 631730-1730
Irving, TX 75063

American InfoSource LP as agent for
DIRECTV, LLC
PO Box 51178
Los Angeles, CA 90051-5478

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Ashro Dsnb
1111 Duke Blvd
Columbus, OH 43218-2124

Ashley Stewart
Comenity
Po Box 182124
Columbus, OH 43218-2124

Ashro
3650 Milwaukee St.
Madison, WI 53714-2304

Ashro Lifestyle
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

CERASTES, LLC
C O WEINSTEIN & RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Cap One Na
Po Box 26625
Richmond, VA 23261-6625

Capital One
16525 N Riverwoods Blvd
Mettawa, IL 60045-3440

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

Chase Card
Po Box 15298
Bilmington, DE 19850-5298

Citibank/The Home Depot
Citicorp Credit Svcs/Centralized Bankrup
Po Box 790040
Saint Louis, MO 63179-0040

City of Milwaukee Water
841 N Broadway Room 406
Milwaukee, WI 53202-3613

Collect Asso
Po Box 465
Brookfield, WI 53008-0465

Comenity Bank/New York & Company
Attention: Bankruptcy
P.O. Box 182125
Columbus, OH 43218-2125

Comenity Bank/Torrid
Attention: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Consumer Cellular
1204 SW Durham Road
Suite 300
Portland, OR 97224-7574

Department Stores National Bank
c/o American InfoSource LP
PO Box 4457
Houston, TX 77210-4457

Deutsche Bk ELT Academic Ln Group
Claims Filing Unit
PO Box 8973
Madison, WI 53708-8973

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Discover Fin Svcs LLC
Po Box 15316
Wilmington, DE 19850-5316

Diversified Consultant
10550 Deerwood Park Blvd
Jacksonville, FL 32256-0596

Donb Macys
1111 Duke Blvd
Mason, OH 45040-8999

(p)EDUCATORS CREDIT UNION
1326 WILLOW RD
MOUNT PLEASANT WI 53177-1917

Falls Anesthesia Assoc., S.C.
225 S Executive Drive
Brookfield, WI 53005-4257

Fed Loan Serv
Po Box 60610
Harrisburg, PA 17106-0610

First Credit Union
2121 E Rawson Ave
Oak Creek, WI 53154-1642

Froedert Health/Community Mem. Hosp.
400 Woodlawn Prime, Suite 103
N74 W12501 Leatherwood Ct.
Menomonee Falls, WI 53051-4490

Froedtert & Medical College of Wisconsin
PO BOX 13428
Milwaukee, WI 53213-0428

Gm Financial
Po Box 181145
Arlington, TX 76096-1145

Harley Davidson Financial
Attention: Bankruptcy
Po Box 22048
Carson City, NV 89721-2048

Internal Revenue Service
Department of the Treasury
P.O. Box 7346
Philadelphia, PA 19101-7346

Jared/Sterling Jewelers
Po Box 1799
Attn: Bankruptcy
Akron, OH 44309-1799

Joseph, Mann & Creed
P.O. Box 1270
Twinsburg, OH 44087-9270

M.T. Distributing
1379 S. Howell Ave.
Milwaukee, WI 53207-5053

MILWAUKEE WATER WORKS
200 E WELLS ST
RM 800
MILWAUKEE WI 53202-3515

Marine Credit Union
P.O. Box 309
Onalaska, WI 54650-0309

Marine Cu
Po Box 309
Mond Du Lac, WI 54936-0309

Medical College Physicians
P.O. Box 13308
Milwaukee, WI 53213-0308

Midland Funding LLC
PO Box 2011
Warren, MI 48090-2011

Northstar Loans
1800 W Appleton Ave
Milwaukee, WI 53218-5309

Oac
Po Box 500
Baraboo, WI 53913-0500

Ocwen Loan Servicing L
12650 Ingenuity Dr
Orlando, FL 32826-2703

Office of the U. S. Trustee
117 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

Omega RMS, LLC
P.O. Box 801688
Kansas City, MO 64180-0001

Omega Rms
7505 W Tiffany Spr
Kansas City, MO 64153-1313

Optimum Outcomes Inc
1651 Warrenville Rd Ste
Downers Grove, IL 60515-5559

Quantum3 Group LLC as agent for
Comenity Bank
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Sterling Jewelers Inc
PO Box 788
Kirkland, WA 98083-0788

Santander Consumer Usa
Po Box 961245
Fort Worth, TX 76161-0244

Sears/cbna
Po Box 6189
Sioux Falls, SD 57117-6189

Special Procedures Unit
Wisconsin Department of Revenue
PO Box 8901
Madison, WI 53708-8901

Sterling Jewelers, Inc.
c/o Jared The Galleria of Jewelry
c/o Buckley King LPA
100 Superior Avenue East, Suite 1400
Cleveland, Ohio 44114-2693

Summit Credit Union
2424 Rimrock Rd
Madison, WI 53713-2701

Synchrony Bank / HH Gregg
Attention: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

Synchrony Bank/ Old Navy
Attention: GEMB
Po Box 103104
Roswell, GA 30076-9104

Synchrony Bank/JC Penny
Attention: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

Synchrony Bank/Select Comfort
Attn: Bankruptcy Dept
Po Box 103104
Roswell, GA 30076-9104

Synchrony Bank/ShopNBC(Evine Live)
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

U.S. Department of Education
c/o Fedloan Servicing
P.O. Box 69184
Harrisburg, PA 17106-9184

United Consumer Financial Services
865 Bassett Rd
Westlake, OH 44145-1194

United Consumer Financial Services
Mass & Associates, P.C.
1936 E. Ft. Lowell Rd, Suite #200
Tucson, AZ 85712-1083

Us Dep Ed
Po Box 5609
Greenville, TX 75403-5609

Veteransadmi
5000 W. National A
Milwaukee, WI 53295-0001

Wi Energies
Attn Bankruptcy Dept. RM A130
133 W Everett St
Milwaukee WI 53290-0002

Wi Electric / Wi Energies
Attention: Jill Costello
Po Box 2046 Room A130
Milwaukee, WI 53201-2046

Carl Edward Morris
9340 W. Brentwood Ct.
Milwaukee, WI 53224-5209

Carolyn Ann Morris
1340 W. Brentwood Ct.
Milwaukee, WI 53224-5209

Chad L. Schomburg
2600 N. Mayfair Road
Suite 700
Milwaukee, WI 53226-1314

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203-0161

Michael S. Georg
Debt Advisors, S.C.
1600 N. Mayfair Road
1700
Milwaukee, WI 53226-1314

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Americollect Inc
1851 S Alverno Rd
Manitowoc, WI 54220

Educators Credit Union
Attn: Bankruptcy Department
1326 Willow Road
Mt. Pleasant, WI 53177

(d)Educators Credit Union
Attn: Bankruptcy Dept
1400 N Newman Road
Racine, WI 53406

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Aurora Health
Address???

(u)Aurora UW Academic Medical Group
Address???

(u)Safe Security???
Address???

End of Label Matrix	
Available recipients	81
Bypassed recipients	3
Total	84